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October 18, 2018

VIA ECF

Hon. Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007

Re: Gramercy Produce, Inc. v. Green Summit Group LLP a/k/a Green Summit Group
LLC et al
Case No.: 18-cv-5868 (GHW)

Dear Judge Woods:

We are the attorneys for the plaintiff in the above-entitled action and we submit this joint application along with Andrew Singer, Esq. and Jonathan Lockinger, Esq., the attorneys for the defendant, Green Summit Group LLC and Todd Millman.

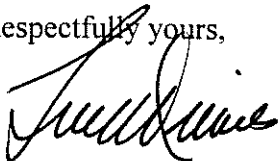
The purpose of this application is to continue the Initial Pre-Trial Conference before the Court on November 2, 2018 at 4:00 p.m.

The first reason is that we have filed an amended complaint joining one Peter Schatzberg, as a party-defendant, and he has yet to be served. Not having him appear at this Pre-Trial Conference, whether in person or by attorney, would just delay matters. We are attempting to determine how to serve him and that is one of the reasons for this application.

The second reason for this application is that Mr. Singer and I are in settlement negotiations. They are serious discussions and should result in some resolution of this case. Therefore, we request an opportunity to continue those discussions for an additional thirty (30) days in the hope of resolving the action globally. As a result, we request a date in December. I personally request a day other than a Friday in the afternoon, since both Mr. Singer and I reside in Long Island and the traffic on a Friday, for want of a better word, is "brutal". I ask the indulgence of the Court in this regard.

The courtesy and cooperation of Chambers is greatly appreciated.

Respectfully yours,



LEONARD KREINCES

LK/lc

Enc.

cc: Jonathan M. Herman, Esq. (via email)
Mediation Office (via email)
Joseph D. Lockinger, Esq. (via email)
Andrew W. Singer, Esq. (via email)

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